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April 20, 1998

VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: MM Docket No. 87-268

Dear Ms. Salas

Transmitted herewith, on behalf of Noe Corp. L.L.C., the licensee of Television Broadcast Station KNOE-TV, Monroe, LA, are an original and four copies of its Petition for Reconsideration of the Allotment of DTV Channel 8 to Station KPLC-TV, Lake Charles, LA in the above-referenced proceeding.

Questions regarding this matter should be addressed to undersigned counsel.

Very truly yours


Stanley S. Neustadt

Encl.

cc: Scott S. Patrick, Esq. (w/encl)
Robert Eckert, FCC (w/encl)

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APR 20 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

In the Matter of

)

)

Advanced Television Systems and Their

)

Impact Upon the Existing Television

)

MM Docket No. 87-268

Broadcast Service

)

TO: The Commission

PETITION OF NOE CORP. L.L.C. FOR RECONSIDERATION OF ALLOTMENT OF DTV CHANNEL 8 TO STATION KPLC-TV, LAKE CHARLES, LA.

Noe Corp. L.L.C. (Noe), the licensee of Television Broadcast Station KNOE-TV, Monroe, La, respectfully requests that the Sixth Report and Order in the above-captioned proceeding be modified to delete the allotment of DTV Channel 8 to Station KPLC-TV, Lake Charles, LA., and to substitute therefor DTV Channel 53, the original allotment, or one of the other channels suggested for that purpose by Cosmos Broadcasting Corporation (Cosmos), the licensee of Station KPLC-TV, in its Petition for Reconsideration in this proceeding. Noe will demonstrate the very serious deleterious effects of the DTV Channel 8 allotment on the NTSC operation of Station KNOE-TV and upon the viewers who rely on its service, effects which could be avoided by the allotment of another suggested DTV channel for Station KPLC-TV. This could be accomplished without creating comparable harm to any station. In support of its position, Noe states:

1. Station KNOE-TV is licensed for NTSC operation on Channel 8 at Monroe, LA. It is affiliated with the CBS Television Network. Station KPLC-TV is licensed for NTSC

operation on Channel 7 at Lake Charles, LA. In the Sixth Report and Order in this proceeding the Commission allotted Channel 53 as Station KPLC's paired DTV channel. This proposal, of course, would not have had any adverse effect whatsoever on Station KNOE-TV. However, in a Petition for Partial Reconsideration filed by Cosmos on June 13, 1997, it urged the allotment of either Channel 8, 13, 19, 38, 39, or 43 as its paired DTV channel, with Channel 8 being the most desirable, even though it would have to utilize a directional antenna to use that channel, which could not be designed until more engineering data became available (Tech. Ex , Attachment F). A Supplement to that Petition was filed by Cosmos on August 22, 1997, in which the effects of use of DTV Channel 8 were described (Tech.Ex., Attachment F). That Supplement recognized that significant new interference would be caused to the NTSC service of Station KNOE-TV on Channel 8.

2. On August 25, 1997, Cosmos, having inadvertently failed to include with its Supplement a service list, filed a service list of parties on whom the Supplement was served, either by hand delivery or by overnight courier. Five attorneys were on that list, but *it did not include, nor was there, any service on Noe or its counsel.*^{1/} Stations KPLC-TV and KNOE-TV are located in different markets, Lake Charles and Monroe, approximately 218 kilometers apart. Moreover, because Cosmos had sought reconsideration of a number of DTV channels allotted to its various stations, there was nothing in the caption or title of its Petition or Supplement which could have alerted Noe to the Channel 8 request. Noe became aware of the request only when the Commission granted the allotment of DTV Channel 8 as requested by Cosmos. Had it been aware of the Cosmos request, this Petition (or an Opposition) would have been filed at the time. Noe believes that had

^{1/} Neither did Cosmos serve Station KUHT-TV, the other station which would receive new interference from KPLC's use of DTV Channel 8. This was because counsel for Cosmos are also counsel for Station KUHT-TV.

the material set forth in this Petition been before the Commission at the time, the DTV Channel 8 allotment would not have been made, but that another channel would have been chosen, or Station KPLC-TV would have had to keep the original Channel 53 allotment.

3. The Cosmos Supplement acknowledges that its proposed use of DTV Channel 8 would result in interference to Station KNOE-TV (Supplement, p. 10; Tech. Ex. Attachment F). It is not at all clear that the Cosmos showing is based on a directional operation of Station KPLC-TV, or, if so, the parameters of that DA. The directional operation provided for Station KPLC-TV in the Commission's decision on reconsideration had not been published when the Cosmos Supplement was filed. The attached Engineering Statement of Bernard R. Segal, P.E., the consulting Engineer for Noe (Segal Eng.), sets forth the interference effects on Station KNOE-TV and Station KUHT-TV of the operation of Station KPLC-TV with the directional antenna specified by the Commission. The figures concerning the proposed interference are surprisingly close to those set forth by Cosmos in its Supplement, although in the text of the Supplement Cosmos does not mention the population in the area of new interference. As will be shown, it is difficult to understand how Cosmos could so remarkably have understated the harmful effects of that interference.

4. The new interference to NTSC Station KNOE-TV caused by DTV Station KPLC-TV with both operating on Channel 8 would affect 130,000 persons in an area of 2,820 square kilometers, or 19% of the population and 6.8% of the area currently served within the Grade B contour of Station KNOE-TV (Segal Eng., pp.4-5; Fig.3).^{2/} This would surely be a severe

^{2/} The extent of the new interference to Station KNOE-TV exceeds the acceptable standard specified for modification applications. To inflict new interference of this magnitude would be both unnecessary and inefficient, especially in a situation where other channels are

adverse effect on those persons within the interference area. Cosmos, at Supplement, p. 10, treats this interference as essentially of no consequence because it does not occur in the KNOE-TV DMA, and because, Cosmos asserts, where it does occur, "actual viewership of KNOE(TV) in the affected regions * * * is 'grossly subordinate' to same- network affiliates in nearby Lafayette, LA or Shreveport, LA." This assertion is ostensibly supported by ratings data set forth in Tech. Ex., Attachment F. To the extent that the material submitted by Cosmos may have some validity in the gross, it ignores much more compelling data in the detail. Whatever the ratings data may be for the affected parishes as a whole, a detailed analysis establishes that in the area of new interference from DTV Station KPLC-TV, *Station KNOE-TV is the only affiliate of its network which provides Grade B service to 122,816 persons in 2,274 square kilometers (Segal Eng. , pp-8-9; Fig. 10).* Where, as here, the Commission is dealing with the allocation of facilities on a nationwide basis, considerations of service, rather than the transitory matters of listener behavior, must always prevail.

5. In any event, data from the Nielsen County Coverage Study, 1997, lends strong support to the Noe contention that the allotment of DTV Channel 8 to Station KPLC-TV will deprive a great number of viewers of the service of the CBS Television Network which they have received from Station KNOE-TV, and require them to make other, non-off-air arrangements if they wish to receive those programs--clearly an inefficient and inappropriate solution to a broadcast allocations problem. That Nielsen study establishes, for example, that in Rapides Parish the CBS share for KNOE-TV is 3, and the KLFY-TV, Lafayette share is 5, that in Natchitoches Parish the

available. Moreover, the operation of Station KPLC-TV would also cause interference to 10,000 persons within the Grade B contour of Station KUHT, Houston, TX (Segal Eng. p.6; Fig. 6).. The latter station has not objected to the Cosmos proposal, however.

KNOE share is 4 and the KSLA-TV, Shreveport share is 16, and that in Grant Parish the KNOE share is 8 and the KLFY share is 1. Each of those Parishes is, at least in part, within the area that would receive new interference from the DTV operation on Channel 8 of Station KPLC-TV.^{3/}

6. In terms of allocations on a nationwide basis, the allotment of DTV Channel 8 to Station KPLC-TV is egregiously erroneous. Noe has described above the serious detrimental effects of the allotment on its service and on its viewers. But it would also adversely affect the service of Station KPLC-TV. It is the announced policy of the Commission to attempt with the DTV allotments to replicate the existing Grade B service areas of NTSC stations with as little as possible interference. The allotment of DTV Channel 8 to Station KPLC-TV will decrease its service, as well as cause more interference--results which were avoided by the Commission's original allotment of DTV Channel 53 to that station.^{4/} Segal Eng., attached hereto, establishes (at pp. 5-6; Figs.4,5) that operating on Channel 8 Station KPLC-TV would receive from Station KNOE-TV interference to some 18,000 persons (1.9%) and over 4.7% of the land area currently served within its Grade B contour, interference which it would not receive operating on DTV Channel 53.

7. That from an allocations point-of-view the allotment of DTV Channel 8 to Station KPLC-TV is the very worst allocations decision that could be made can hardly be gainsaid. Cosmos attempted to justify it by noting the monetary savings which it would receive, and by

^{3/} These data are essentially supported by Cosmos' representations in Tech. Ex., Attachment F, p.6.

^{4/} Noe has chosen to compare the Channel 8 allotment with the original allotment of Channel 53, which Cosmos has found unacceptable, in order to demonstrate the seriousness of the error in changing the allotment at the request of Cosmos. It might very well be that allotment of one of the other channels suggested by Cosmos would also be much more in line with Commission policy than the allotment of Channel 8.

grossly minimizing the very harmful effects it would have on other stations and their viewers. If such an approach were widely adopted by the Commission, the transition to DTV would be doomed, at least in terms of the paramount consideration--service to the public. Reference to Figure 10 of the attached Engineering Statement demonstrates graphically--better than any verbal argument-- the loss of the only CBS service *available* to more than 120,000 people. Noe respectfully requests that the aberration which has occurred be rectified.

Respectfully submitted

NOE CORP. L.L.C.

By Stanley S. Neustadt

Robert B. Jacobi
Stanley S. Neustadt

COHN AND MARKS
1920 N Street, N.W.
Washington, D.C. 20036

(202) 293-3860

April 20, 1998

Its Attorneys

AFFIDAVIT

My name is Allen Jones and I am the station manager of television station KNOE-TV, Monroe, Louisiana. I have reviewed the Petition of Noe Corp. L.L.C. for Reconsideration of Allotment of DTV Channel 8 to Station KPLC-TV, Lake Charles, Louisiana. The factual assertions set forth in paragraph 5 are true and correct.

Further affiant sayeth naught.

Allen Jones
Allen Jones

Subscribed and sworn to before me this

17th day of April, 1998.

My commission expires: at death

Laura Z Roberts
Notary Public

Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

**ENGINEERING STATEMENT
IN SUPPORT OF
PETITION FOR RECONSIDERATION
NOE CORP. L.L.C.
MONROE, LOUISIANA**

Noe Corp. L.L.C. (hereafter, Noe) is the licensee of KNOE-TV, Monroe, Louisiana. Station KNOE-TV is authorized for NTSC operation on Channel 8 with peak visual effective radiated power of 316 kilowatts (kW) and antenna radiation center height above average terrain of 576 meters. In the Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order, the FCC allotted Ch. 8 for DTV use for station KPLC-TV, Lake Charles, Louisiana. Station KPLC-TV currently operates on Ch. 7 and is located 218.8 kilometers from KNOE-TV. The instant engineering statement is in support of a petition for reconsideration of the FCC's action with respect to the allotment of DTV Ch. 8 to Lake Charles for paired use for station KPLC-TV. Hereafter, in referring to the digital operation of a particular station, the call sign will be prefixed by the letter "D".

The Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order did not include the Ch. 8 Lake Charles allotment in Appendix B, "DTV Table of Allotments". Rather, the allotment was ordered in paragraph

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Washington, DC

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219 of the narrative portion of the Memorandum Opinion and Order. No statement concerning the facilities for the new allotment are given nor is there any indication of how the allotment comports with the announced criteria for the allotment of DTV channels with respect to KNOE-TV, KPLC-TV and station KUHT, Houston, Ch. 8 which, also, would be impacted by the Ch. 8 DKPLC-TV operation.

Appendix B in the Memorandum Opinion and Order references the original Ch. 53 TV allotment for paired use with NTSC Ch. 7 at Lake Charles. The allotted DTV power for Ch. 53 was 1,000 kW with an antenna radiation center height above average terrain of 451 meters. That DTV allotment provided for 100 percent DTV/NTSC area match for KPLC-TV. The current KPLC-TV NTSC area and population within the Grade B contour are respectively indicated as 35,159 square kilometers and 940,000 persons. The comparable figures for KNOE-TV for its paired DTV Ch. 55 operation employing 1,000 kW effective radiated power and antenna radiation center height above average terrain of 576 meters, yields a 100 percent DTV/NTSC area match, corresponding to a Grade B service area of 41,197 square kilometers and population of 688,000 persons.

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Consulting Engineer
Washington, DC

Engineering Statement
Monroe, Louisiana

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As part of its Petition for Partial Reconsideration of the FCC's allotment of Ch. 53 for DKPLC-TV, the proponent, Cosmos Broadcasting Corporation, indicated that operation on Ch. 8 would require a replication power of 17 kW and that use of a directional transmitting antenna would be required, but the design of that antenna was not possible due to the lack of appropriate allocation tools (see Technical Statement of du Treil, Lundin & Rackley, Inc. dated June 12, 1997).

As part of the review to determine the impact of the Ch. 8 DTV allotment to Lake Charles on the operation of KNOE-TV, the undersigned discovered that the FCC's pattern replication database for digital channels included a directional radiation characteristic for the Ch. 8 allotment for Lake Charles. The tabulated data for that pattern are included herewith in Figure 1, and that pattern has been used in the studies that have been prepared herein to determine the impact of the Lake Charles Ch. 8 DTV allotment.

The HDTV program developed by Telecommunications Analysis Services (TA Services) using the Institute for Telecommunications Sciences (ITS) irregular terrain model has been employed. The ITS irregular terrain

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model is the computer implementation of the Longley-Rice prediction methodology that has been used by the FCC in developing the DTV allotment table. TA Services is a branch of the ITS and ITS is part of the US Department of Commerce. Because there are differences in the way that the TA Services and the FCC programs sample terrain and enumerate populations, some differences between the TA Services and FCC results can occur. Also, the TA Services population database includes 1995 updated information to the 1990 Census.

Figure 2 shows the current NTSC Grade B coverage for KNOE-TV without regard to the Ch. 8 DTV allotment to Lake Charles. The interference-free service is to 684,000 persons in 41,250 square kilometers. Those values are in excellent agreement with the FCC's Appendix B values of 688,000 persons in 41,197 square kilometers.

Figure 3 is the same study as Figure 2, but includes the effect of the Ch. 8 DTV allotment to Lake Charles using the directional antenna radiation pattern data of Figure 1 with a maximum effective radiated power of 17 kW.

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Consulting Engineer
Washington, DC

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The interference to KNOE-TV will impact 130,000 persons in 2,820 square kilometers, representing 19 percent of the population and 6.8 percent of the area currently served by KNOE-TV within the Grade B contour.

Figure 4 shows the present Grade B service for KPLC-TV as authorized for operation on Ch. 7 and takes into account interference from other NTSC stations according to the FCC's procedures. The interference-free Grade B population is 937,00 persons in 35,090 square kilometers. The corresponding values in the FCC's Appendix B are 940,000 persons in 35,159 square kilometers. Here, again, the TA Services results are in excellent agreement with the FCC's results.

Figure 5 shows the Grade B limited service for DKPLC-TV operating on Ch. 8 with maximum effective radiated power of 17 kW and the FCC's directional antenna radiation characteristic as set forth in Figure 1. Interference would be received from co-channel KNOE-TV. The interference population would be 18,000 persons in an area of 1,650 square kilometers, corresponding to 1.9 percent of the existing KPLC-TV interference-

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Consulting Engineer
Washington, DC

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free Grade B population and 4.7 percent of the interference-free Grade B area. The Grade B replication for DKPLC-TV would be poorer on Ch. 8 than on Ch. 53. The foregoing figures for the area for KPLC-TV do not take into account that a portion of the Grade B service is in the Gulf of Mexico. Hence, insofar as land area is concerned, the 1650 square kilometer interference from NTSC KNOE-TV represents a larger percentage than 4.7.

Another station that is impacted by the DKPLC-TV Ch. 8 allotment is KUHT, Houston, Texas, Ch. 8. Figure 6 shows the KUHT Grade B contour, the interference from existing NTSC stations, and the interference caused by DKPLC-TV, Ch. 8. The KUHT present Grade B interference-free population is 3,873,000 person in an area of 37,430 square kilometers (includes water). The interference from DKPLC-TV, Ch. 8, impacts 10,000 persons in 1140 square kilometers (includes water). The DKPLC-TV interference corresponds to 0.3% of the population and 3.1 percent of the area within the present KUHT interference-free Grade B contour.

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Consulting Engineer
Washington, DC

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The foregoing areas and populations of interference-free service for KNOE-TV, DKPLC-TV, and KUHT are summarized in Figure 7. The FCC's original Ch. 53 DTV allotment for Lake Charles does not create interference to any other facility. Clearly, the original FCC allotment of digital Ch. 53 for paired use for KPLC-TV is in better consonance with the stated FCC objectives for achieving replication than is the allotment of Ch. 8. With almost 20 percent interference to the population served by KNOE-TV, the reduced replication population served by DKPLC-TV, and the population lost by KUHT, the conclusion is that the original Ch. 53 allotment for use for DKPLC-TV, represents a better choice. Approximately 174,000 more persons in 5519 square kilometers would either receive Grade B or better service or would have DTV Grade B replication service when DKPLC-TV operates on Ch. 53 than on Ch. 8.

KNOE-TV is a CBS affiliate. The only other CBS affiliated stations that provide Grade B or better service within the portion of the KNOE-TV Grade B contour that could be impacted by interference from the DKPLC-TV, Ch. 8, operation are KSLA-TV, Shreveport, Louisiana, Ch. 12, and KLFY-TV, Lafayette, Louisiana, Ch. 10. TA Services studies were performed to establish

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Washington, DC

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the extent of Grade B interference-free coverage provided by the CBS stations, KSLA-TV and KLFY-TV. Figure 8 shows the study developed for KSLA-TV and Figure 9 is the similar study for KLFY-TV.

The studies of Figures 8 and 9 were sequentially overlayed on the map of Figure 3. By that means, it was possible to determine those portions of the DKPLC-TV, Ch. 8, interference to KNOE-TV that could have CBS coverage from an alternate source. Figure 10 shows the DKPLC-TV generated interference areas within the KNOE-TV Grade B contour that would and would not have available an alternate source of CBS Grade B or better service. The duplicated areas were traced and photographically enlarged to conform to the scale of the 1990 US Census Parishes, Subdivisions and Places map for Louisiana. The areas were then transferred to the Census map and an enumeration made of the interference populations from DKPLC-TV that could receive an alternate source of over the air CBS programming. That procedure yielded 7,184 persons in 546 square kilometers who would have an alternate interference-free over the air CBS programming source. The area was determined by polar planimeter

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measurement. Thus, implementation of the Ch. 8 DTV allotment at Lake Charles would result in 122,816 persons in 2,274 square kilometers losing their sole source of over the air CBS service of Grade B or better.



Bernard R. Segal, P.E.
April 13, 1998

Figure 1

**ENGINEERING STATEMENT
IN SUPPORT OF
PETITION FOR RECONSIDERATION
NOE CORP. L.L.C.
MONROE, LOUISIANA**

FCC Database Channel 8 DTV Directional Pattern for Lake Charles, Louisiana
(Paired with NTSC Channel 7)

<u>Azimuth</u> (degrees True)	<u>Relative Field</u>	<u>Azimuth</u> (degrees True)	<u>Relative Field</u>
0	1.000	180	1.000
10	0.220	190	1.000
20	0.200	200	1.000
23.7	0.200	210	1.000
30	0.200	220	1.000
40	0.220	230	1.000
50	1.000	240	1.000
60	1.000	250	1.000
70	1.000	260	1.000
80	1.000	270	1.000
90	1.000	280	1.000
100	1.000	290	1.000
110	1.000	300	1.000
120	1.000	310	1.000
130	1.000	320	1.000
140	1.000	330	1.000
150	1.000	340	1.000
160	1.000	350	1.000
170	1.000		

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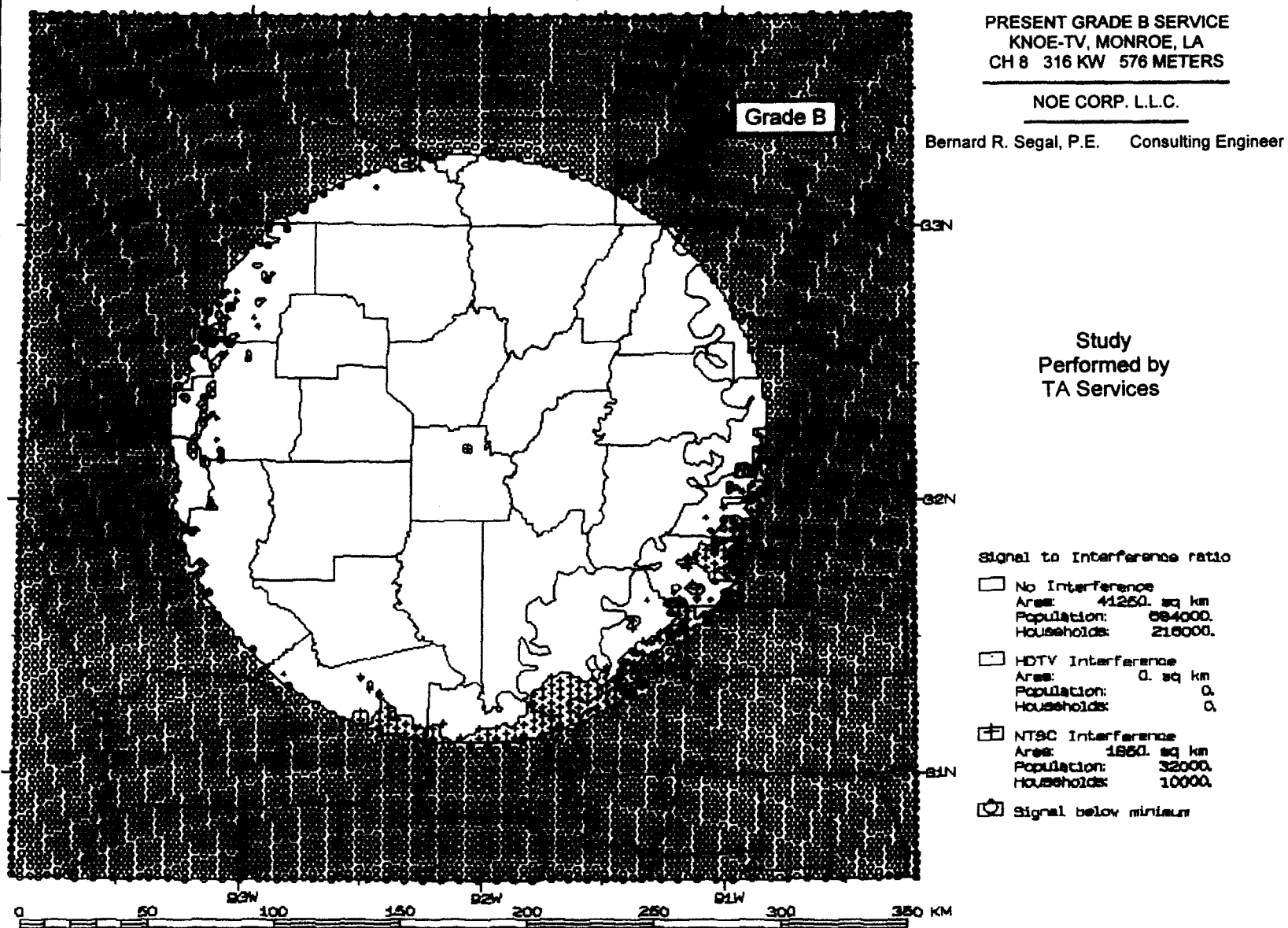


Figure 2

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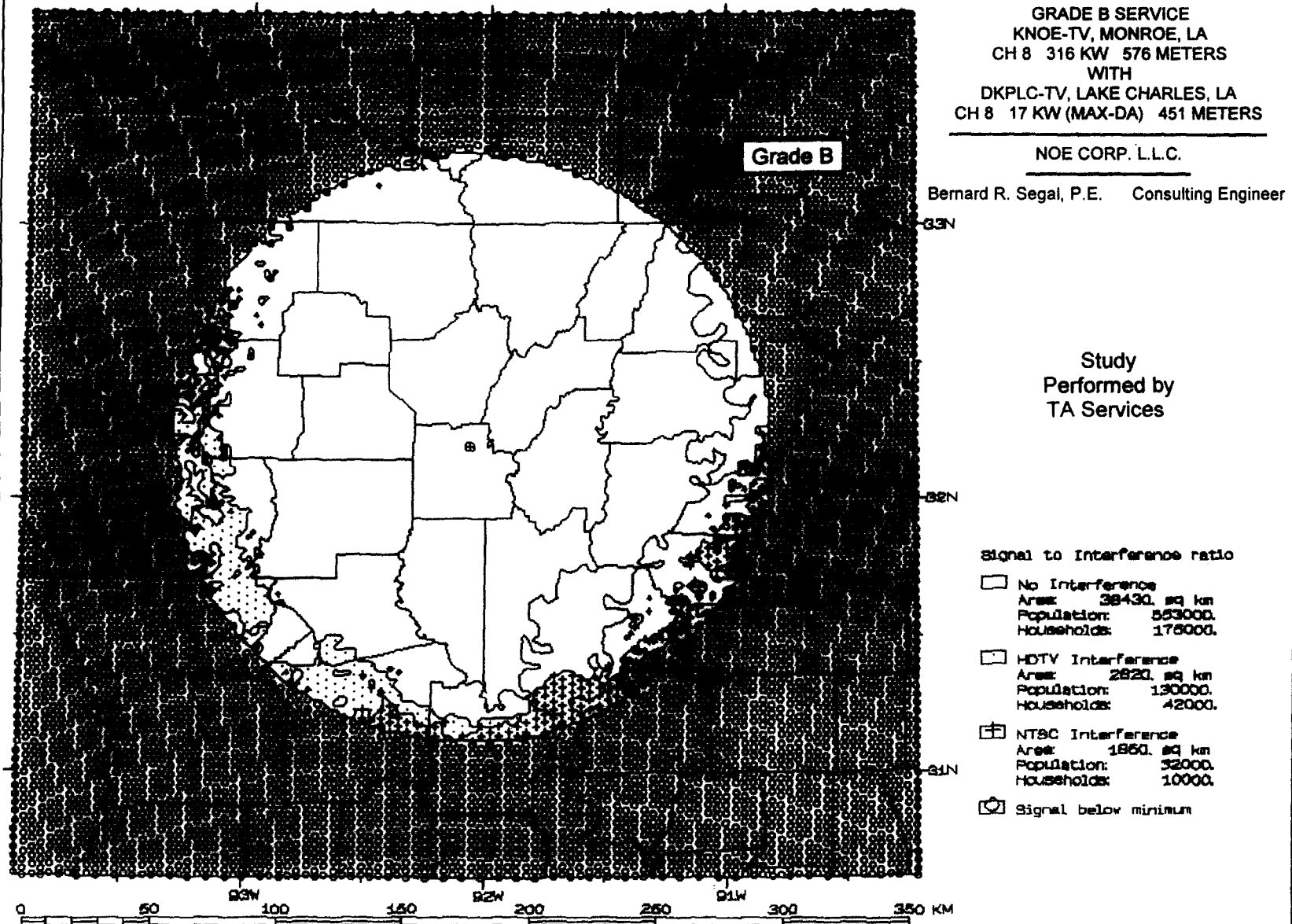


Figure 3

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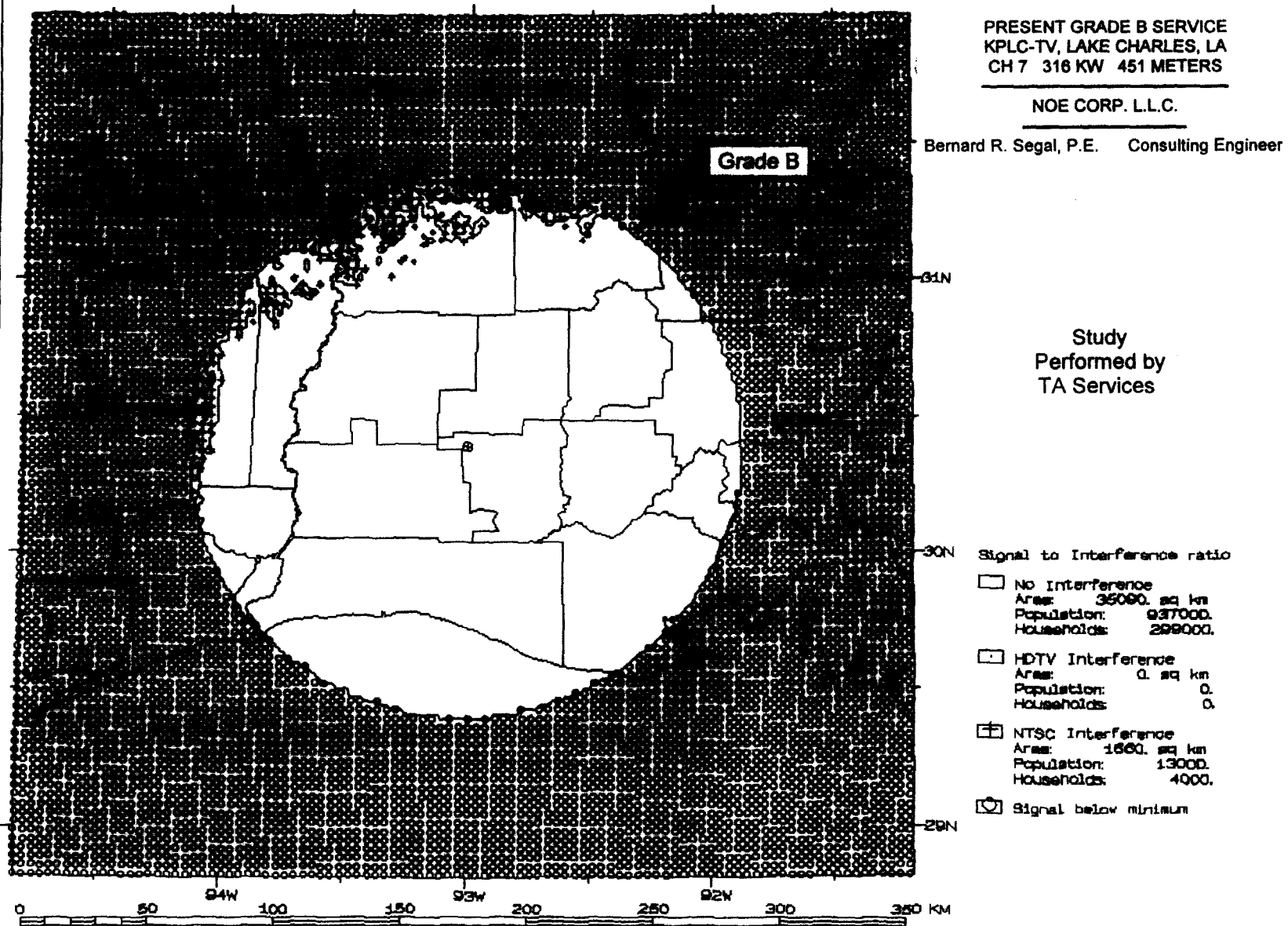


Figure 4

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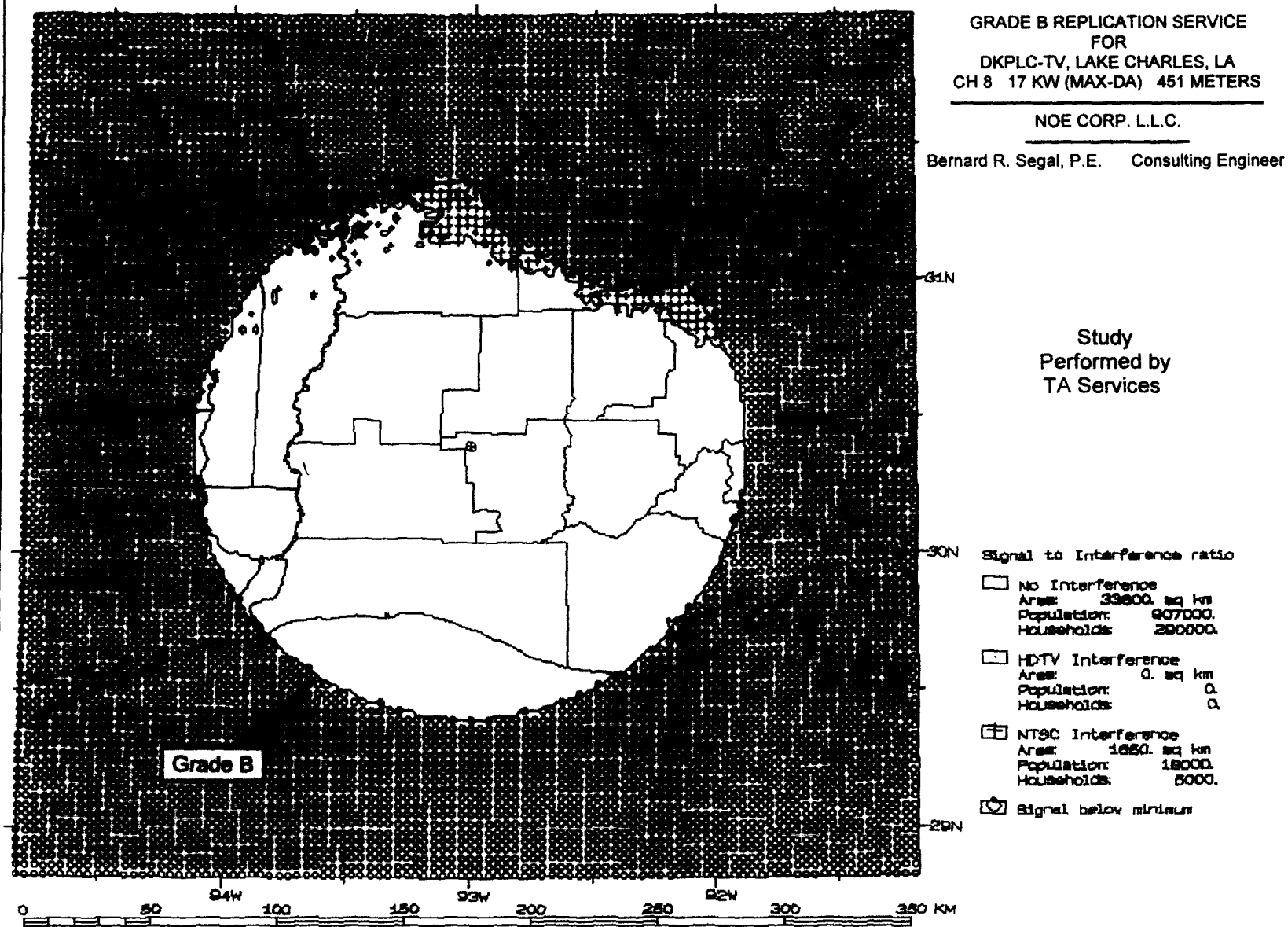
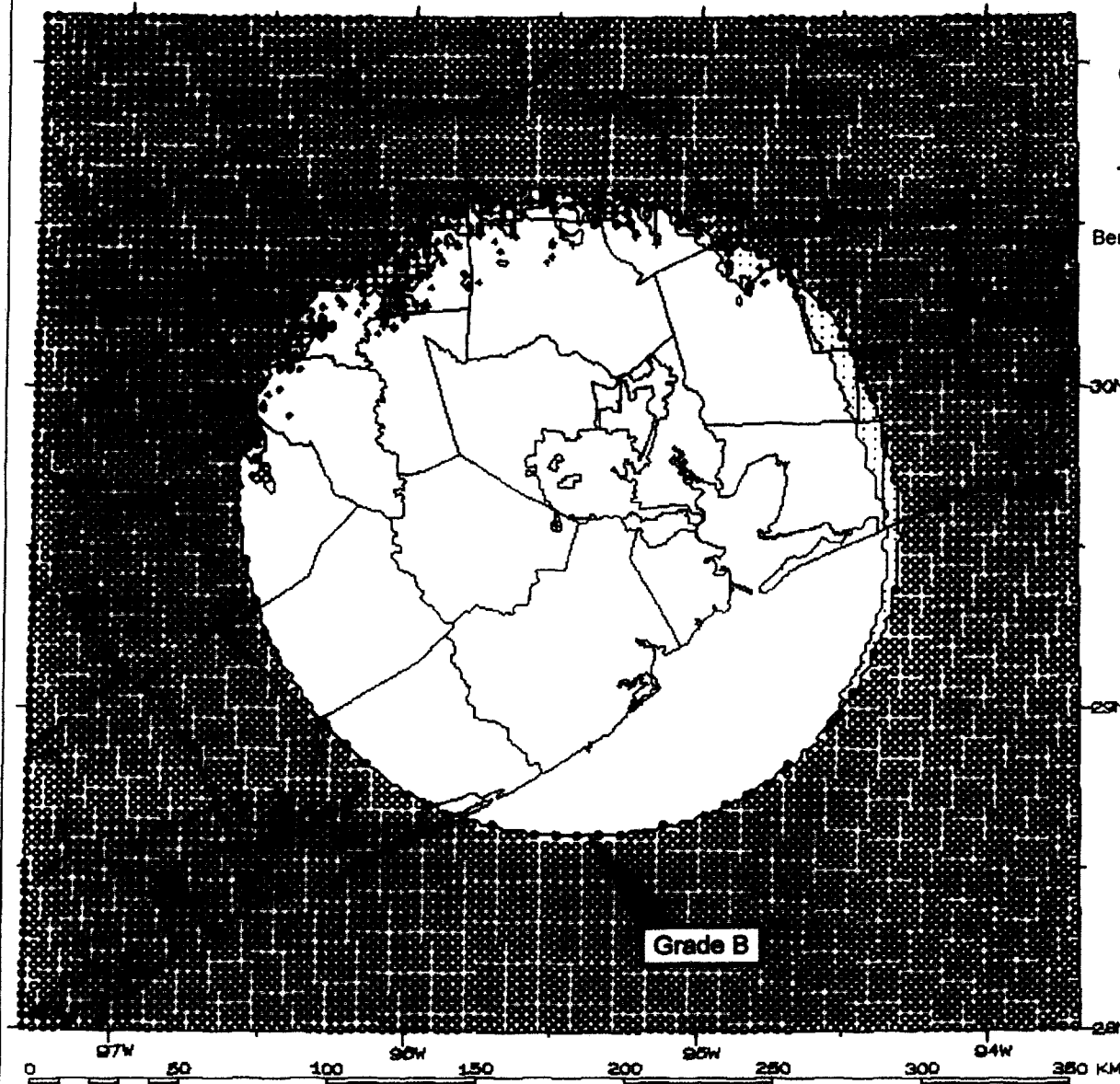


Figure 5

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GRADE B SERVICE
KUHT, HOUSTON, TX
CH 8 316 KW (MAX-DA) 564 METERS
WITH
DKPLC-TV, LAKE CHARLES, LA
CH 8 17 KW (MAX-DA) 451 METERS

NOE CORP. L.L.C.

Bernard R. Segal, P.E. Consulting Engineer

Study
Performed by
TA Services

Signal to Interference ratio

- ☐ No Interference
Area: 38260. sq km
Population: 3863000.
Households: 1303000.
- ☐ HDTV Interference
Area: 1140. sq km
Population: 10000.
Households: 3000.
- ☐ NTSC Interference
Area: 1010. sq km
Population: 20000.
Households: 10000.
- ☐ Signal below minimum

Figure 6

**ENGINEERING STATEMENT
IN SUPPORT OF
PETITION FOR RECONSIDERATION
NOE CORP. L.L.C.
MONROE, LOUISIANA**

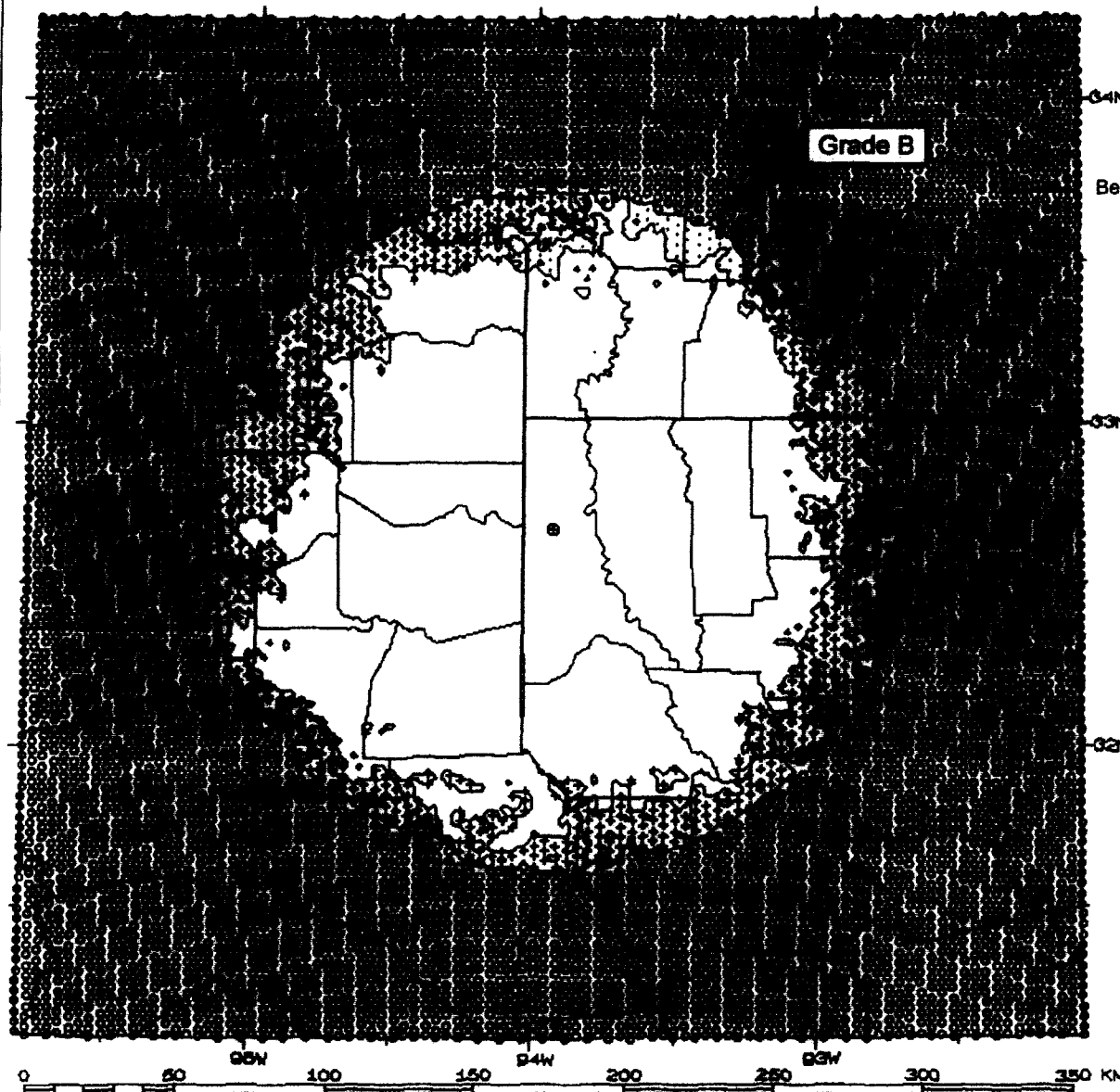
Comparison of Results for DKPLC-TV on Channel 8
with DKPLC-TV on Channel 53
(TA Services Results Except Where Otherwise Indicated)

	With <u>DKPLC-TV, Ch. 8</u>		With <u>DKPLC-TV, Ch. 53</u>	
	<u>Population</u> (1990 Census) ²	<u>Area</u> (sq. km)	<u>Population</u> (1990 Census) ²	<u>Area</u> (sq. km)
KNOE-TV Interference-free Grade B	553,000	38,430	684,000	41,250
DKPLC-TV, Interference-free within NTSC Grade B	907,000	33,600	940,000 ¹	35,159 ¹
KUHT Interference-free Grade B	3,863,000	36,290	3,873,000	37,430
Aggregate	5,323,000	108,320	5,497,000	113,838
Net improvement with DKPLC-TV, Ch. 53			174,000	5,519

¹ Per Appendix B in Memorandum Opinion and Order On Reconsideration of the Sixth Report and Order.

² Updated by 1995 information except for Appendix B results.

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INTERFERENCE-FREE GRADE B
SERVICE FOR CBS AFFILIATED
STATION KSLA-TV, SHREVEPORT, LA
CH 12 316 KW 549 METERS

NOE CORP. L.L.C.

Bernard R. Segal, P.E. Consulting Engineer

Study
Performed by
TA Services

Signal to Interference ratio

- ☐ No Interference
Area: 30080. sq km
Population: 847000.
Households: 290000.
- ☐ HDTV Interference
Area: 1040. sq km
Population: 13000.
Households: 5000.
- ☐ NTSC Interference
Area: 9390. sq km
Population: 120000.
Households: 38000.
- ☒ Signal below minimum

Figure 8